

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**ELIZABETH HORTON**

**Plaintiff,**

**v.**

**DON WILLIAMS, individually  
and in his capacity as the  
Manager of National Seating and  
Mobility, Inc., NATIONAL  
SEATING AND MOBILITY,  
INC., GERALD SHOCKLEY,  
individually and in his capacity of  
a special agent of the Alabama  
Attorney General's Office, and  
The ALABAMA MEDICAID  
AGENCY,**

**Defendant.**

**CIVIL ACTION NUMBER:  
2:06-cv-526-MHT-DRB**

**MOTION FOR LEAVE OF COURT TO FILE A REPLY TO  
PLAINTIFF'S RESPONSE TO MOTION TO DISMISS OF  
DEFENDANT NATIONAL SEATING AND MOBILITY, INC.**

In order to fully address the matters now before the Court, Defendant National Seating and Mobility, Inc. ("NSM") respectfully seeks permission to file a reply to Plaintiff's August 9, 2006, Response to NSM's Motion to Dismiss.

Respectfully submitted,

s/Charles A. Stewart, III

Charles A. Stewart III (STE067)  
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**Attorney for Defendant  
National Seating & Mobility, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Deborah M. Nickson  
Attorney for Petitioner  
2820 Fairlane Drive, Suite A-10  
Montgomery, Alabama 36116

William O. Butler  
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Montgomery, AL 36101

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Office of the Attorney General  
11 South Union Street  
Montgomery, AL 36130

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None.

s/Charles A. Stewart III  
Charles A. Stewart III  
Attorney for Defendant  
National Seating & Mobility, Inc.  
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